

Exhibit A



CONFIDENTIAL – ATTORNEYS’ EYES ONLY

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

| | | |
|------------------------------|---|--------------------------|
| NETLIST, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 2:22-cv-293-JRG |
| vs. |) | |
| |) | JURY TRIAL DEMANDED |
| SAMSUNG ELECTRONICS CO, LTD; |) | (Lead Case) |
| SAMSUNG ELECTRONICS AMERICA, |) | |
| INC.; SAMSUNG SEMICONDUCTOR |) | |
| INC., |) | |
| |) | |
| Defendants. |) | |

| | | |
|---------------------------------|---|--------------------------|
| NETLIST, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 2:22-cv-294-JRG |
| vs. |) | |
| |) | JURY TRIAL DEMANDED |
| MICRON TECHNOLOGY, INC.; MICRON |) | |
| SEMICONDUCTOR PRODUCTS, INC.; |) | |
| MICRON TECHNOLOGY TEXAS LLC, |) | |
| |) | |
| Defendants. |) | |

**PLAINTIFF NETLIST, INC.’S FIRST NOTICE OF DEPOSITION OF DEFENDANTS
SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC.,
AND SAMSUNG SEMICONDUCTOR, INC. PURSUANT TO RULE 30(b)(6)**

Please Take Notice that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, and the Local Rules of this Court, Plaintiff Netlist, Inc. (“Netlist”) will take the deposition by oral examination of Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively “Samsung” or “Defendants”). The deposition(s) will commence on November 1, 2023 at 9:00 am PT, or such other date and time as may be agreed by the parties, and will continue from day to day (excluding Saturdays, Sundays, and holidays) until completed. The deposition will take place at 1800 Avenue of the Stars, Suite 900, Los Angeles, CA 90067, or another mutually agreeable location. The deposition(s) will be conducted

TOPIC NO. 4:

The Identification of all Samsung Accused Products, including the meaning of Samsung's product codes or part numbers.

TOPIC NO. 5:

The design, structure, configuration, operation, functionality, and features of the Samsung Accused Products, including explanation of Documents relating to the design, structure, configuration, operation, functionality, and features of the Samsung Accused Products produced in this Action.

TOPIC NO. 6:

The Identity and location of Documents and Source Code related to Key Technical Information and the Identity of Persons having access to these Documents and Source Code.

TOPIC NO. 7:

The Identity and location of Documents and Source Code related to the Patented Features in the Samsung Accused Products and the Identity of Persons having access to these Documents and Source Code.

TOPIC NO. 8:

The Identity of Documents and Source Code that Samsung receives from and/or shares with its Suppliers, Partners, and Distributors as related to the Samsung Accused Products.

TOPIC NO. 9:

The Identity of Documents and Source Code that Samsung has a right to or has requested from its Suppliers, Partners, and Distributors as related to the Samsung Accused Products.

TOPIC NO. 10:

Samsung's policies practices, and procedures for Document management, storage, and

CERTIFICATE OF SERVICE

I hereby certify that, on October 19, 2023, a true and correct copy of the foregoing instrument was served or delivered electronically via email to all counsel of record.

/s/ Yanan Zhao
Yanan Zhao